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June 27, 2018

VIA ECF AND FIRST CLASS MAIL

Honorable Victor Marrero
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Reply Letter
Docket No.1:90-cv-05722-VM

Dear Hon. Marrero:

Your Honor's Memo Endorsement directed the Office of the Independent Monitor (IM) to respond to my office's letter dated June 15, 2018 submitted to Your Honor on behalf of Union Members, Michael Donnelly and Peter Corrigan in connection with claims against the New York City District Council of Carpenters ("District Council"). This letter is submitted in brief reply to the IM's response letter of June 25, 2018.

As a general matter, the IM's response contains numerous factual inaccuracies and concomitantly, admissions of fact that support the Council's and IM's knowledge of a particular employee's sexual harassment claim against Steven McInnis, the President of the District Council before the election and its failure to promptly investigate and remediate her hostile work environment and duly apprise the membership.

We agree with the IM to the extent that "action requires credible proof." However, we respectfully submit that "credible proof" was presented and ignored. This credible proof still exists today and can be provided to your Honor by way of direct witnesses and documentation. As the issues involve sensitive matters (and more than "a mere violation of personnel policy") as well as legitimate concerns of retaliation by various Union Members, apart from Mr. Donnelly and Mr. Corrigan, we respectfully request that we be permitted to meet with Your Honor in Chambers either before or after the June 29, 2018 status conference with Mr. McGorty and any other counsel or representative the Court directs.

Thank you for your consideration in this matter.

Respectfully yours,

/s/

Donna H. Clancy

DHC/ymm

cc: **BY ECF**

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